



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

NJM:EHS/ADR
F. #2023R00792

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 23, 2025

By ECF and Email

The Honorable Peggy Kuo
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Michail Chkhikvishvili
Criminal Docket No. 24-286

Dear Judge Kuo:

The defendant Michail Chkhikvishvili is scheduled to be arraigned today on the above-referenced Indictment, which charges him with: (i) soliciting and conspiring to solicit hate crimes and other violent felonies, in violation of 18 U.S.C. §§ 371 and 373 (Counts One and Two); (ii) distributing instructions on making explosives and poisons in furtherance of violent felonies, in violation of 18 U.S.C. § 842(p) (Count Three); and (iii) transmitting threatening communications, in violation of 18 U.S.C. § 875(c) (Count Four). *See* ECF No. 4.

As explained in greater detail below, the defendant, a Georgian national who also goes by the moniker “Commander Butcher,” is a leader of the Maniac Murder Cult, also known as “Maniacs Murder Cult,” “Maniacs: Cult of Killing,” “MKY,” “MMC,” and “MKU,” a violent international neo-Nazi extremist group. As alleged in the Indictment, the defendant recruited others to commit violent acts in furtherance of MKY’s ideologies, including planning and soliciting a mass casualty attack in New York City targeting Jewish children and other minority communities. The defendant was arrested in July 2024 in Chişinău, Moldova, based on a Complaint, *see* ECF No. 1, and was extradited to the United States yesterday.

For the reasons below, the government respectfully submits that the Court should enter an order of detention pending trial because the defendant presents both a danger to the community and a risk of flight.¹

¹ Detailed herein is a proffer of the relevant facts and a discussion of the applicable law pertaining to the pretrial detention of the defendant. *See United States v. LaFontaine*, 210 F.3d 125, 130-31 (2d Cir. 2000) (holding that the government is entitled to proceed by proffer in detention hearings).

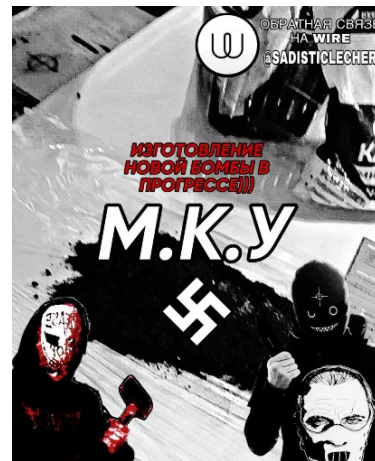
I. Relevant Facts

A. Maniac Murder Cult (“MKY”)

Chkhikvishvili-led MKY is a Russian- and Ukrainian-based racially or ethnically motivated violent extremist (“RMVE”) group with members in the United States and around the world. MKY adheres to a neo-Nazi accelerationist ideology and promotes violence against racial minorities, the Jewish community, and other groups it deems “undesirables.” MKY members share a common goal of challenging social order and governments via terrorism and violent acts that promote fear and chaos. *See* Complaint ¶ 2.

MKY members and recruits have regularly communicated through Telegram, the encryption-enabled social media and mobile messaging service. Telegram advertises itself as a secure and untraceable communications platform. Telegram allows users to communicate one on one, in public or private group chats, and through “channels.” As defined by Telegram, channels are a tool for broadcasting public messages to large audiences and can have an unlimited number of subscribers. *See id.* ¶ 3.

MKY channels have been used to share videos depicting and encouraging acts of violence on behalf of MKY, including what appear to be beatings, stabbings, and other assaults. Posts in these channels have also specifically sought the recruitment of those with experience working with explosives and with biological and chemical weapons to engage in mass violence. *See id.* ¶ 4. Below are examples of the type of violent imagery posted in Telegram channels and chats associated with MKY:

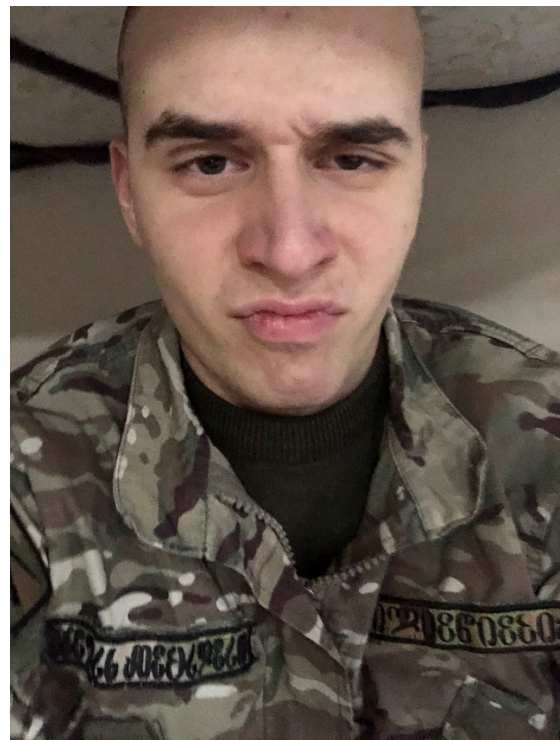


The defendant, using the alias “Commander Butcher,” among other aliases, has held himself out to be a “recruiter,” “administrator,” and “curator” for MKY, and ultimately its “leader.” Since in or about September 2021, the defendant has published various editions of an English-language manifesto titled the “Hater’s Handbook,” which has been distributed on MKY Telegram channels and elsewhere. A third edition of the Haters Handbook was circulated in or about October 2023, purportedly authored by “Commander Butcher and the MMC Collective.” The Handbook discusses MKY’s principles and encourages members to engage in acts of violence in furtherance of those principles. Chapter titles include “Weapons of Anarchy” and

“White Race One Race.” *See id.* ¶ 5. The introduction to the third edition of the Hater’s Handbook states in part:

I’m Commander Butcher National-Socialist since birth and curator of MMC also known as Maniacs Murder Cult I can proudly say I’ve murdered for white race and willing to bring more of chaos in this rotten world. This book is for readers who are cruel warriors or are willing to become one and are ready to step on massive actions Our main goal is to spread flames of Lucifer and continue his mission of ethnic cleansing, great drive of purification.

Id. Members of RMVE groups like MKY use the phrase “actions” to mean violent acts in furtherance of the groups’ ideologies. Among other things, the Hater’s Handbook encourages its readers to commit school shootings and to use children to perpetrate suicide bombings and other mass killings targeting racial minorities. The document describes methods and strategies for committing mass “terror attacks,” including, for example, using vehicles to target “large outdoor festivals, conventions, celebrations and parades” and “pedestrian congested streets.” It also specifically encourages committing attacks within the United States. *See id.* ¶ 6. The defendant, pictured below, distributed and promoted the Hater’s Handbook on various platforms.



B. The Defendant’s Offense Conduct

Beginning at least as early as July 2022, the defendant has encouraged others over Telegram, Wire, and other platforms, to commit acts of violence on behalf of MKY, including soliciting acts of mass violence in New York from an undercover FBI employee (“UC-1”) whom

the defendant believed to be a prospective MKY recruit. The defendant has further made violent threats on Instagram, including threats to kill a former girlfriend (“Individual-1”).²

a. Communications with Convicted White Supremacist Leader

As alleged in the Complaint, in or about and between July 2022 and March 2023, the defendant engaged in extensive communications over Telegram with Nicholas Welker, an individual who at the time was the leader of an international RMVE group called Feuerkrieg Division (“FKD”). Like MKY, FKD adhered to a neo-Nazi ideology and targeted racial minorities, the Jewish community, the LGBTQ community, and journalists. In or about September 2023, Welker pled guilty to federal charges for making death threats against a Brooklyn-based journalist in response to the journalist’s investigation of racially motivated violent extremists. *See id.* ¶ 13. On or about April 19, 2024, Welker was sentenced to 44 months’ imprisonment by the Honorable Pamela K. Chen (14 months above the high-end of the United States Sentencing Guidelines of 24 to 30 months). *See United States v. Welker*, No. 23-CR-141 (PKC), ECF No. 38.

The defendant communicated with Welker about committing acts of violence against Jewish victims and others on behalf of MKY in the United States. For example, on or about July 19, 2022, the defendant stated, “Mky is only group so far that done so many kills.” On or about August 26, 2022, the defendant stated, “Mky members preparing actions soon.” Before that, on or about July 3, 2022, the defendant messaged Welker, “Is there anyway to get unmarked guns here [*i.e.*, in the United States]?” and “Besides killing we should rob victims too.” *Id.* ¶ 14. The defendant also bragged to Welker that he harmed and attempted to kill a Jewish victim in Brooklyn, New York. Specifically, on or about July 11, 2022, the defendant messaged Welker, “I’m working in rehab center privately in Jewish family // I get paid to torture dying jew // I think I almost killed him today actually // If he dies soon that’s killstrike on me.” *Id.* ¶ 15. The defendant sent Welker multiple images of his purported client in a hospital bed and bragged about harming the client.

Based on the images and additional investigation, JTTF personnel were able to identify the Brooklyn-based rehabilitation facility referenced by the defendant and spoke with members of the Orthodox Jewish family who employed him. JTTF personnel confirmed that the defendant indeed worked for the family in July 2022 caring for a now-deceased family member in the rehabilitation facility. Among other things, a member of the family positively identified the now-deceased family member in the photographs sent by the defendant to Welker, and further identified a photograph of the defendant shown to him by JTTF personnel as the individual the family had hired, stating that he believed the individual was from Georgia and that he went by the name “Michael,” which is an English iteration of the defendant’s first name, Michail. *See id.* ¶ 15. The defendant worked for the family for a matter of weeks and left with little notice. (The government does not allege that the defendant’s actions in fact resulted in this individual’s death, but it is clear from the defendant’s communications that that is what the defendant intended to suggest to Welker).

² The Complaint contains detailed evidence attributing each one of the messaging and social media accounts described below to the defendant. *See generally* Complaint.

The defendant and Welker discussed MKY at length and repeatedly discussed targeting Jewish people and racial minorities with violence until Welker's arrest in late March 2023. For example, on July 3, 2022, the defendant stated, "Bloody beating isn't enough // Killing and grinding is now important." Welker responded, "Done to the right 'people' of course // Der Untermensch." "Der Untermensch" is a German phrase that roughly translates to "the subhuman" and was used by members of the Nazi party during World War II to refer to non-Aryan individuals deemed to be inferior. On July 4, 2022, Welker reiterated, "I just save my rage for the right people," "That's why I'm NS [National Socialist] // Because I love my race." Welker added, "Hate is a necessary response // To what threatens you." That same day, the defendant stated, "I want to grind with homies on cash // And kill people." On July 13, 2022, Welker told the defendant, "Yes I agree killing, when for the right reasons is natural and not evil." He added, "Jews have softened the world up and brainwashed the general population into thinking: KILLING BAD!"

On December 4, 2022, Welker told the defendant, "I wanna do some action against trash badly." As discussed above, members of RMVE groups like MKY use the phrase "actions" to mean violent acts in furtherance of the groups' ideologies. The defendant responded, "I'm gonna murder again // This time on camera // Because it's funny." Welker replied, "But idk im tryna be smart" (*i.e.*, not get caught, or solicit the acts from others rather than commit them himself). To that end, Welker referenced the idea discussed in the Hater's Handbook that white individuals should cause individuals of racial minority groups to commit violent acts upon other individuals of racial minority groups. On July 4, 2022, Welker messaged the defendant, "As far as using non NS and non whites for action, where I live is perfect for that," and "We just need to give them motivation."

The defendant also discussed taking steps to shield his criminal actions from law enforcement authorities. On or about March 20, 2023, Welker relayed a series of questions to the defendant over Telegram from an unknown individual seeking to join MKY and to learn its methods. Among other things, Welker asked on behalf of the individual, "Is there any way in particular MKY avoided the footage of their ultraviolence challenge submissions being traced to them? I think the obvious starters would be of course VPNs and posting the content on encrypted sites from anon accounts." The defendant responded, "You remove metadata from video first // Or from any file committing such crime as murder which will be investigated." *Id.* ¶ 17. The government understands Welker's reference to MKY's "ultraviolence challenge submissions" to mean MKY's practice of encouraging its recruits and members to film themselves committing acts of violence and to distribute the videos.

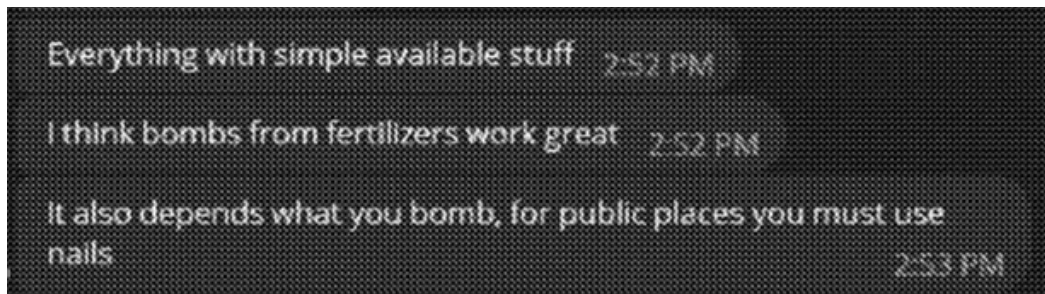
Thereafter, Welker asked the defendant if he should put the individual directly in touch with the defendant so that they could discuss how the individual could join MKY. The defendant responded, "Just explain to them what membership in mky means and what actions should be recorded in good quality Beating, Arson, Killing // Beating brutal one not regular." *Id.* ¶ 18.

b. Solicitation of Acts of Mass Violence Against Jewish People, Racial Minorities, and the Homeless

From in or about September 2023 through his arrest, the defendant communicated on Telegram and Wire with UC-1, an undercover FBI employee whom the defendant believed to be a prospective MKY member. During the course of the communications, the defendant made detailed and specific overtures to UC-1 to commit acts of mass violence—in particular, murders of Jewish people, racial minorities, and homeless individuals in New York City—on behalf of MKY, including bombings, arson, and the spreading of poisons such as ricin.

For example, on or about September 8, 2023, the defendant messaged UC-1 about recruiting “maniacs” to join MKY and told UC-1 that he was in the process of writing the third edition of the Hater’s Handbook, which would address “direct actions.” The defendant stated, “I see USA as big potential because accessibility to firearms and other resources.” The defendant sent UC-1 links to violent videos that he described as “murder vids” and directed UC-1 to a Telegram channel where he could view additional videos of “hardcore actions” such as “videos of mky beheading and blowing up busses.” *Id.* ¶ 21. The channel contained videos depicting assaults and graphic violence.

In the same conversation, UC-1 asked the defendant whether there was an application process to join MKY. The defendant responded, “Well yes we ask people for brutal beating, arson/explosion or murder vids on camera.” He stated that “[p]oisoning and arson are best options for murder,” and suggested also considering a larger “massmurder[]” within the United States. The defendant advised UC-1 that the victims of these acts should be “low race targets.” *Id.* ¶ 22. Later that month, the defendant began to provide more specific instructions to UC-1 for committing a violent attack. On or about September 29, 2023, UC-1 asked the defendant what kind of “action” he should take to join MKY. *Id.* ¶ 23. The defendant suggested making a homemade explosive device. He provided guidance as depicted below:



The defendant further told UC-1, “We have to choose our target first,” and later followed up asking, “So who are we targeting?” The defendant sent UC-1 files titled “MMC – COLD WEAPON” and “MMC – MANHUNT INSTRUCTION” and stated, “I want you to read those.” The “Cold Weapon” document described how to attack and kill victims using knives, hammers, screwdrivers, and other weapons. The “Manhunt Instruction” document described how to avoid detection by law enforcement after attacking and killing victims, for example by changing clothes and hiding weapons. *See id.* ¶ 24.

The defendant also sent UC-1 several detailed manuals on building explosive devices. For example, he sent UC-1 a file called “Detonator,” which was a Russian-language bomb-making manual. The document provided a step-by-step guide on creating the various components of an explosive device, including the types and amounts of chemicals needed and how to mix them. The defendant advised that “murdering anyone in USA supports mky tbh // Big opportunity.” *Id.* ¶ 25. The same day, on or about September 29, 2023, the defendant sent UC-1 a Russian-language document containing detailed instructions for committing acts of arson. The defendant stated, “This is very good arson guide it’s on [sic] Russian // Just translate pdf.” The defendant told UC-1, “When you finish reading all pdf-s we will on targets // You can even arson with no trace even nyc.” UC-1 indicated that he would travel from Pennsylvania to New York City to execute the attack. The defendant instructed UC-1 to target places and materials that would burn well and sustain damage, and further suggested targeting “homeless people” because the government would not care “[e]ven if they die.” *Id.* ¶ 26. The defendant thereafter provided additional instructions to UC-1 for creating explosive devices. For example, on or about September 29, 2023, he wrote, “For simple Molotov you just need 1/3 car engine oil 2/3 petrol,” “There’s also one recipe worth of trying // With fertilizer and petrol,” and “You must mix fertilizer and petrol and let it stay on sun for 12 hours, after that it’s ready // Its like flammable bomb.” *Id.* ¶ 27.

As described above, the purpose of the defendant’s communications was to solicit violence and acts of murder on behalf of MKY. On or about October 17, 2023 the defendant told UC-1, “Just gotta make sure many people gonna die really by our hands.” The defendant instructed UC-1 to “[t]ry to record video” or else it would be a “lost action.” *Id.* ¶ 28. The defendant also repeatedly emphasized MKY members’ readiness to commit actual acts of violence rather than merely discussing them. For example, comparing MKY to another group, the defendant bragged that “We murder they larp.” “[L]arp” is a reference to “Live Action Role Playing” games, in which individuals dress in costume and portray fictional characters. The defendant later praised individuals who “killed” as compared to individuals who did not and were therefore “fags,” a derogatory slur for gay men. The defendant also made repeated complimentary references to Islamic jihad—the violent and radical ideology followed by members and supporters of foreign terrorist organizations like ISIS and al Qaeda—and commented that he would “blow up myself with pleasure.” *Id.* ¶ 29.

On or about October 17, 2023, the defendant instructed UC-1 to download Wire because Telegram was not “safe” (*i.e.*, that law enforcement could obtain his Telegram communications). The defendant sent UC-1 his usernames for those platforms. On or about October 30, 2023, the defendant sent UC-1 a PDF copy of the Hater’s Handbook. *See id.* ¶ 30. Soon thereafter, the defendant began communicating with UC-1 on Wire about the schemes they had previously discussed. On or about October 31, 2023, UC-1 told the defendant that he had made and tested Molotov cocktails and was having trouble using them. The defendant responded, “Sometimes don’t explode right?” *id.* ¶ 31, indicating his own familiarity with making and using Molotov cocktails.

The defendant also devised another violent scheme and provided UC-1 with detailed instructions on carrying it out. On or about November 2, 2023, the defendant told UC-1 that he could “do bigger action than Breivik without getting caught.” *Id.* ¶ 32. “Breivik” is a reference to Anders Behring Breivik, a Norwegian neo-Nazi who killed 77 people in a bombing

and mass shooting in Norway in 2011. In particular, the defendant devised a scheme to murder racial minorities and others in New York City on New Year's Eve by dressing up as Santa Claus and handing out candy laced with poison. *See id.* ¶ 33. The defendant relayed step-by-step instructions on how UC-1 could successfully execute the scheme without getting caught, as depicted below:

BUTCHER Nov 2, 6:28 AM

Planning:

- Buy poison materials, clothes and chocolate candies anonymously using delivery services or paying with cash at store, which haven't been withdrawn from your bank account
- Create fake job with fake number, alternative phone. (Needed Santa's in NYC). Send workers stuff required for job, equipment and carry out some part by yourself.
- if doing by yourself, stick sweater to gloves by duct tapes, same for socks and leggings inside Santa uniform, use white Santa gloves and bag full of candies. Big beard, makeup, glasses, shave unnecessary body hair and put fake white eyebrows.
- After giving around poisoned candies to many racial minorities and traitors, just go to taxi, pay to go somewhere, where you will have alternative clothes (don't tell exact location

To driver) and burn Santa clothes and equipment, again use another clothes to go back to home unseen, get rid of alt phones, etc

And most important it must be done on 31 December

You can also install Santa socks with candies in random apartments with no much control

The defendant sent UC-1 a lengthy document titled "The Mujahideen Poisons Handbook" and instructed him that "ricin would be most simple." The document contained detailed instructions on creating and mixing lethal poisons and gases to further the cause of "Islamic jihad." The Mujahideen Poisons Handbook is a document linked to radical Islamist jihadist groups and designated foreign terrorist organizations such as ISIS. The defendant instructed UC-1 on the methods of making ricin-based poison in powder and liquid form, including by extracting ricin from castor beans. *See id.* ¶ 34. The scheme was intended to cause violence in furtherance of MKY's ideology. The defendant stated to UC-1, "Once you do poison attack, I'll do message against US government." On or about November 17, 2023, UC-1 told the defendant that he had obtained materials for extracting ricin and that the plan was on track. *Id.* ¶ 35. The defendant also indicated to UC-1 that he (the defendant) wanted to use ricin and asked the undercover how to obtain ricin or castor beans to make ricin.

On or about December 8, 2023, the defendant contacted UC-1 on Telegram again, stating, "It's me Butcher / Don't give this acc [*i.e.*, account] to anyone." The defendant pressed UC-1 for updates on the poison scheme and UC-1 responded that "your plan is in motion." On

or about December 19, 2023, the defendant messaged UC-1, “Anything new on castor?” This is a reference to extracting ricin poison from castor beans, further to the instructions previously sent by the defendant to UC-1, described above. UC 1 replied that he was in the process of testing the poison he had made. The defendant responded, “I’m glad process is going on” and asked UC-1, “Well how many human doses asides from test ones we got?” UC-1 responded that he had a small amount, and the defendant stated, “Well we’ve got no much time left brother” and that “New Year is coming.” The defendant asked UC-1 how he wanted to be credited in the “mky video” the defendant planned to post after a successful attack. *Id.* ¶ 36.

On or about December 28, 2023, the defendant asked UC-1 how the ricin tests were going, and discussed testing the ricin on small animals. He told UC-1 that the plan did not need to happen on New Year’s Eve and that they could go forward with it in January if needed. On or about January 9, 2024, the defendant followed up again about the ricin and asked UC-1, “So when do you think you’ll be able to test it on humans?” The defendant told UC 1 that they should execute the plan where there would be the “most people operating” and suggested targeting the “Jewish community.” The defendant further noted that “Jews are literally everywhere” in Brooklyn and suggested executing the attack on “some Jewish holiday” and at “Jewish schools full of kids.” He added, “Dead Jewish kids.” The defendant further discussed publishing a video of the planned attack and bragged that “MMC [*i.e.*, MKY] will become bigger than Al Qaeda once it drops.” UC-1 warned the defendant that the attack would “bring alot [sic] of heat on MKY tho [] // just as long as you are good with that.” The defendant responded, “That’s what we exactly want.” On or about January 18, 2024, the defendant asked UC-1, “When should I expect news?” *Id.* ¶ 37.

c. Violent Threats on Instagram

The defendant has further made violent threats on Instagram including threats to kill Individual-1. In or about October and November 2023, the defendant sent messages to multiple unknown users on Instagram from an account with username “human666grinder” in which he discussed committing acts of violence on behalf of MKY and relayed portions of the Haters Handbook. *See id.* ¶ 39. Below are several examples:

human666grinder - 10/30/2023 9:42:12am PDT: MKU/MMC is Maniacs Murder Cult created in Ukraine by Yegor Krasnov

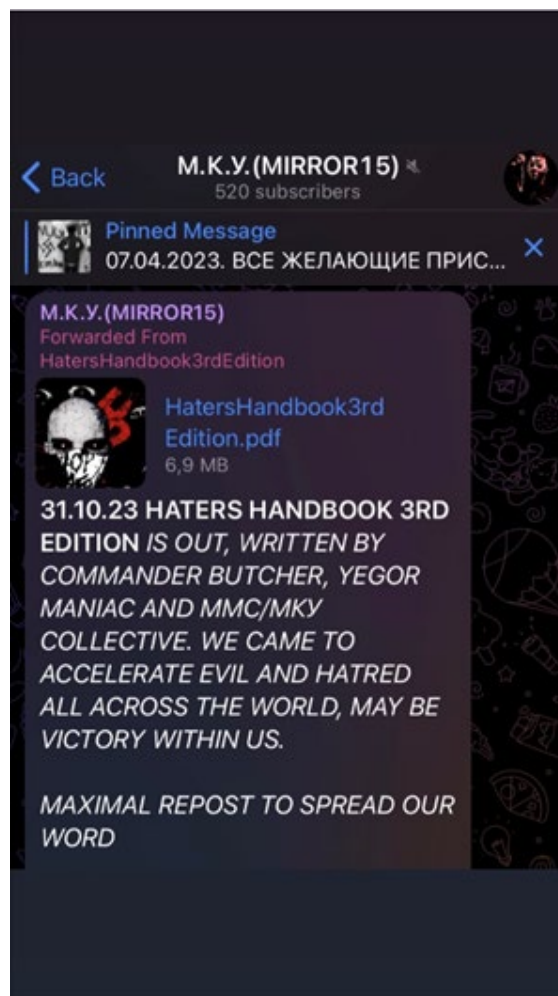
human666grinder - 10/30/2023 9:42:32am PDT: It’s terrorist organization carrying terror attack and murders

* * *

human666grinder - 2023/11/01 00:21 PDT:



human666grinder - 2023/10/30 09:36 PDT:



human666grinder - 2023/10/26 00:53 PDT: Many falsehoods will come amongst our numbers, or will try to call themselves NS. There's no room for you unless you have truly done something and it's not going to gym or wiping off trash in nature, but only spilling blood of enemies, otherwise you are regular normie. We won't show mercy to anyone, everyone against our nihil ideas should be exterminated as well.



* * *

human666grinder - 10/06/2023 11:07:13am PDT: I fucking hate
n[****]rs

human666grinder - 10/06/2023 11:07:16am PDT: It's unreal

██████████ - 10/06/2023 11:07:21am PDT: Me too

██████████ - 10/06/2023 11:07:23am PDT: And gas

██████████ - 10/06/2023 11:07:24am PDT: Gays

human666grinder - 10/06/2023 11:07:30am PDT: And Jews

human666grinder - 10/06/2023 11:07:35am PDT: And Asians

██████████ - 10/06/2023 11:07:36am PDT: Preach

* * *

human666grinder - 10/06/2023 11:09:33am PDT: Have you heard
of MKU/MMC

██████████ - 10/06/2023 11:09:40am PDT: No

██████████ - 10/06/2023 11:09:42am PDT: What is it

human666grinder - 10/06/2023 11:09:55am PDT: It's maniacs murder cult created in 2017

human666grinder - 10/06/2023 11:10:15am PDT: Carrying over 50 murder and 150+ other actions

* * *

human666grinder - 10/08/2023 7:12:54am PDT: Keep looking on haters handbook 3rd edition

██████████ - 10/08/2023 7:13:01am PDT: Idk what that is

human666grinder - 10/08/2023 7:13:08am PDT: Book

human666grinder - 10/08/2023 7:13:18am PDT: It will be published on Halloween

* * *

human666grinder - 10/08/2023 8:09:38am PDT: Glory to total rape and death of whores

██████████ - 10/08/2023 8:09:48am PDT: Amen

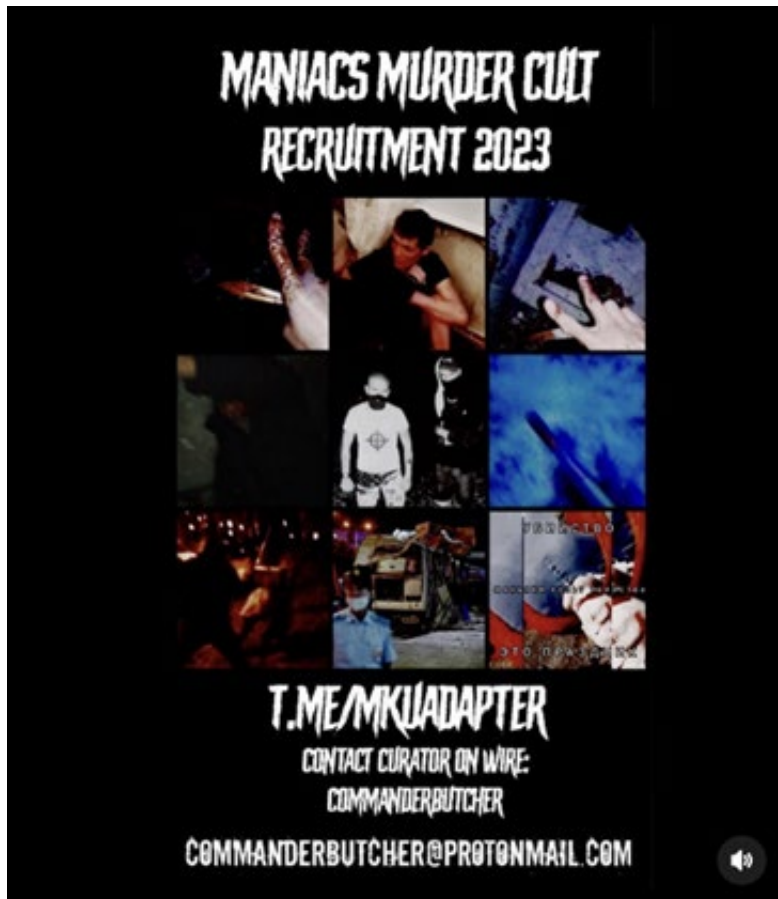
* * *

██████████ - 10/30/2023 4:54:36am PDT: Stupid Jew cucks

human666grinder - 10/30/2023 4:55:27am PDT: They all will be burned in one bloody pot

Id. In additional conversations, the defendant stated that he was considering traveling to the United States, that it was a “good place for illegal grind,” and that he was “[g]onna poison half of nyc,” “bomb NYC,” and “kill everyone there.” The defendant bragged that he had “[k]illed a Jew,” that he was “glad I have murdered,” and that “I will murder more” but “make others murder first.” *Id.* ¶ 40.

The defendant also distributed a video depicting the gruesome torturing and killing of small animals and posted MKY recruitment materials from the “human666grinder” account on Instagram, as depicted below:



Id. ¶ 41. Lastly, the defendant contacted Individual-1 in late 2023 via direct message on Instagram using the “human666grinder” account. The defendant made threats toward her including that he wanted to kill her. The defendant boasted about having committed acts of violence such as rape, and told Individual-1 that he wanted to destroy the United States government. *Id.* ¶ 42.

II. Legal Standard

Under the Bail Reform Act, Title 18, United States Code, Section 3141, *et seq.*, federal courts are required to order a defendant’s detention pending trial upon a determination that the defendant is either a danger to the community or a risk of flight. *See* 18 U.S.C. § 3142(e) (a judicial officer “shall” order detention if “no condition or combination of conditions would reasonably assure the appearance of the person as required and the safety of any other person and the community”). A finding of dangerousness must be supported by clear and convincing evidence. *See United States v. Ferranti*, 66 F.3d 540, 542 (2d Cir. 1995); *United States v. Chimurenga*, 760 F.2d 400, 405 (2d Cir. 1985). A finding of risk of flight must be supported by a preponderance of the evidence. *See United States v. Jackson*, 823 F.2d 4, 5 (2d Cir. 1987); *Chimurenga*, 760 F.2d at 405.

The Bail Reform Act lists the following factors to be considered in the detention analysis: (1) the nature and circumstances of the offenses charged; (2) the weight of the evidence against the defendant; (3) the history and characteristics of the defendant; and (4) the nature and seriousness of the danger to any person or the community that would be posed by the defendant's release. *See* 18 U.S.C. § 3142(g).

III. The Court Should Enter an Order of Detention for the Defendant

Every factor to be considered in the detention analysis demonstrates that the defendant presents both a significant danger to the community and a substantial risk of flight if released on bond. Accordingly, the Court should enter an order of detention pending trial.

A. The Charged Offenses and Danger to the Community

The charged offenses are extremely serious and violent. The defendant recruited others to commit attacks in furtherance of MKY's ideologies, including planning and soliciting a mass casualty attack in New York City targeting Jewish children and other minority communities. The defendant also repeatedly bragged to others that he had himself committed violence on behalf of MKY, including murder, and bragged about harming a sick and elderly Jewish man in Brooklyn. He further stated that he wanted to obtain "unmarked guns" in the United States in order to commit additional violence here. The defendant distributed detailed bomb-making instructions and poison-making instructions, as well as thorough plans for committing a successful attack without getting caught. He suggested that he had experience making and using Molotov cocktails and indicated that he was looking to obtain ricin poison.

The defendant's repeated solicitations of violence have had the intended effect. They have directly resulted in real violence, including multiple senseless killings, in the United States and around the world. For example:

- In January 2025, a 17-year-old student killed one individual and injured another before committing suicide inside Antioch High School in Nashville, Tennessee. The attacker livestreamed part of the attack. Prior to the attack, in an audio-recording posted online and attributed to him, the attacker claimed he was taking action on behalf of MKY and at least one other group. The attacker's manifesto explicitly mentioned the defendant by name and included numerous references to MKY's founder, Yegor Krasnov. The attacker stated that he would write Krasnov's name on his gun.
- In August 2024, an individual livestreamed himself stabbing approximately five people outside of a mosque in Eskisehir, Turkey, wearing a "siege mask," helmet, and tactical vest depicting a black sun and Totenkopf skull (white supremacist symbols linked to Nazi Germany). A manifesto attributed to the attacker included explicit references to the defendant and to violent statements made by him. Before the attack, the attacker also distributed a link to the Hater's Handbook, authored by the defendant as discussed above, and other violent propaganda. Turkish media outlets reported that the attacker claimed he carried out the attack

due to his “misanthropy,” which is a term commonly used by MKY members and in MKY publications.

- In April 2022, a 17-year-old German national living in Romania murdered a 74-year-old woman and recorded and livestreamed himself brutally stabbing her and slitting her throat. He reportedly committed the murder as part of his initiation into MKY and claimed he killed the woman because she was Jewish; he later told investigators that he killed her because he thought she was Roma. In July 2022, the defendant sent the video of the murder to Welker, writing “This granny shit is so funny.” Welker stated, “Finished the job Hitler couldn’t.” The defendant responded, “Finishing* // We just started.”

The defendant has consistently demonstrated that he is capable of orchestrating deadly attacks from behind a computer screen at home. Moreover, the defendant has repeatedly stated that he has committed acts of violence and that he intends to commit more. The Court should take the defendant at his word and detain him in the interest of public safety.

B. The Weight of the Evidence

The weight of the evidence against the defendant is strong. The evidence includes the defendant’s extensive communications with Welker, his extensive communications with UC-1 (some of which were found on the phone seized from him incident to his arrest in Moldova), his posts on Instagram, the Hater’s Handbook, witness testimony, and extensive attribution evidence linking the defendant to the messaging and social media accounts used in the offense conduct, as summarized in the Complaint. Moreover, during a *Mirandized* post-arrest interview with FBI agents, the defendant admitted to his conduct. He confirmed his affiliation with MKY, his use of the Commander Butcher alias, and his involvement in drafting and distributing the Hater’s Handbook, which he said was intended to inspire people. He confirmed that the relevant accounts and usernames discussed above belonged to him. He confirmed that he was the one communicating with Welker and UC-1, including sending UC-1 bomb-making and poison-making instructions and advising him on the planned attack in New York City, which he said was intended to target Jewish people and other minority communities. Where, as here, the evidence of guilt is strong, it provides “a considerable incentive to flee.” *United States v. Millan*, 4 F.3d 1038, 1046 (2d Cir. 1993); *see also United States v. Palmer-Contreras*, 835 F.2d 15, 18 (1st Cir. 1987) (*per curiam*) (where “the evidence against defendants is strong, the incentive for relocation is increased”).

Moreover, the charged offenses collectively carry a maximum sentence of 50 years’ imprisonment and the government estimates the defendant’s advisory Guidelines range to exceed 20 years. The prospect of a lengthy term of incarceration further gives rise to a serious risk of flight. *See United States v. Jackson*, 823 F.2d 4,7 (2d Cir. 1987); *United States v. Martir*, 782 F.2d 1141, 1147 (2d Cir. 1986) (defendants charged with serious offenses whose maximum combined terms created potent incentives to flee); *United States v. Cisneros*, 328 F.3d 610, 618 (10th Cir. 2003) (defendant was a flight risk because her knowledge of the seriousness of the charges against her gave her a strong incentive to abscond).

C. The Defendant's History and Characteristics

The defendant's history and characteristics confirm that he is a danger to the community, for all of the reasons discussed above. In addition, the defendant was trained in the Georgian military, and therefore likely has experience in using firearms. He also presents a substantial risk of flight. The defendant is a Georgian national who lives in Georgia and has no legal status in the United States. He was detained in Moldova while attempting to travel to Ukraine to seek out fellow extremists there, and was extradited to the United States after opposing and appealing his extradition. He has made every effort to avoid facing justice in the United States. The defendant has only limited ties to the United States and to the community in the Eastern District of New York, with the sole exception being an elderly grandmother in Brooklyn with whom he briefly resided while committing some of the very conduct charged in this case. (The defendant has previously stated to Welker, "I hate my granny" and "I would kill my granny legit.")

Moreover, the defendant's relationships appear to exist predominantly online and all over the world. If the defendant is not detained, he would be able to access the world-wide MKY network, presenting a serious risk of flight. He has already demonstrated his facility with evading detection by law enforcement, for example, in discussing his use of VPNs and hiding metadata, and in his use of several online accounts across multiple encryption-enabled platforms.

IV. Conclusion

For the foregoing reasons, the defendant should be detained pending trial. The defendant has explicitly stated that he intends to commit acts of violence in the United States. Indeed, he has already tried to do so and he inspired a school shooting here. He faces a potential sentence of decades in prison and is a Georgian national who was extradited over his objection. The government respectfully submits that no condition or combination of conditions will assure the safety of the community, the defendant's return to Court, or his compliance with the Court's directives.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

By: /s/
Ellen H. Sise
Andrew D. Reich
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of Court (by Email)
Counsel of Record (by Email)